

1 Michael A. Maxey Jr. (SBN 221732)
2 HEALTHSOURCE GLOBAL STAFFING,
3 A CALIFORNIA CORPORATION
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5 *Attorney for Defendant HealthSource
6 Global Staffing, a California Corporation*

7
8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10
11 JOYCE MCCRAY-KEY, individually and
12 on behalf of other similarly situated
13 persons,

14 Plaintiff,

15 v.
16
17 HEALTHSOURCE GLOBAL STAFFING,
a California Corporation, and DOES 1-50,
inclusive,

18 Defendants.

19 Civil Action, File No.: cv-14-2122

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21 **DECLARATION OF MICHAEL A. MAXEY
22 JR. IN SUPPORT OF NOTICE OF REMOVAL**

23 I, Michael A. Maxey Jr., do hereby declare and state as follows:

24 1. I am the attorney of record for defendant HealthSource Global Staffing, a
25 California Corporation (“HealthSource”). I make this declaration of my own personal knowledge
and, if called as a witness, I could and would testify competently to the matters stated below.

26 2. I have reviewed the personnel records of plaintiff Joyce McCray-Key and found
27 that the last assignment that she worked for HealthSource was in 2012. At that time, she reported
that her address was in the State of Missouri.

28 3. HealthSource is a corporation which was formed and continues to have its
headquarters in the State of California.

4. Within the last four years prior to the filing of this action, HealthSource has

1 employed over 300 people in California who earned at least \$40 per hour and worked 12-hour
2 shifts. A conservative estimate of the daily gross pay of those employees is \$560 (\$40 x 8 hours =
3 \$320 plus overtime rate of \$60 x 4 hours = \$240). The matter in controversy exceeds the sum or
4 value of \$5 million, exclusive of interest and costs, because 300 employees multiplied by 30 days
5 multiplied \$560 is equal to \$5,040,000.00.

6

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct and that this declaration was executed May 8, 2014 in Fremont,
9 California.

10 /S/ Michael A. Maxey Jr.

11 Michael A. Maxey Jr.

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